Keith E. Sharkin

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1185 Avenue of the Americas
New York, NY 10036

212.556.2100

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Attorneys for Plaintiffs

## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Page 1 of 10

VOSS OF NORWAY, A.S.A.;	)
VOSS PRODUCTIONS, AS;	)
VOSS USA, INC.;	)
ENERGY GROUP, AS; and	)
G ENERGY, INC.,	) Civil Action No.
	07 Civ. 7649 (LLS)
Plaintiffs,	
	)
V.	)
	)
REVTECH, INC. and DECO PATENTS, INC.,	)
	)
Defendants.	)
	_)

## NOTICE OF MOTION TO ADMIT REGINA V. CULBERT PRO HAC VICE IN THE ABOVE-CAPTIONED ACTION

PLEASE TAKE NOTICE that upon the affidavits of Keith E. Sharkin and Regina V. Culbert in support of this motion and Status Certificate annexed thereto we will move this Court before the Honorable Judge Louis L. Stanton at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern District of New York for an Order allowing the admission of Regina V. Culbert, an attorney with the firm of Merchant & Gould and a member in good standing of the Bar of Washington, as attorney *pro hac vice* to argue or try the above-captioned case in whole or in part as counsel for plaintiffs.

Respectfully submitted,

Keith E. Sharkin

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	)
V.	)
	)
REVTECH, INC. and DECO PATENTS, INC.,	)
	)
Defendants.	)
	)

### **AFFIDAVIT OF KEITH E. SHARKIN**

STATE OF NEW YORK	)	
		SS
COUNTY OF NEW YORK	)	

Keith E. Sharkin, being duly sworn, deposes and says:

- 1. I am a member of the firm of King & Spalding LLP, attorneys for plaintiffs VOSS of Norway, A.S.A., et.al., in the above-captioned case (the "Plaintiffs").
- 2. I am a member in good standing of the Bar of the State of New York and of the United States District Court for the Southern District of New York. I respectfully submit this affidavit in support of the application of Regina V. Culbert for an order, pursuant to Local Rule 1.3(c) of the Local Rules of this Court, admitting Regina V. Culbert of the law firm of

Merchant & Gould P.C., 701 Fifth Avenue, Suite 4100, Seattle, Washington 98104 to the Bar of this Court to argue and try, in whole or in part, the above-captioned case on behalf of the

Plaintiffs.

3. The application for admission of Regina V. Culbert is annexed hereto. Ms.

Culbert is duly admitted to practice in the State of Washington. Ms. Culbert is in good standing

as a member of the Bar of Washington, as is certified by the Certificate of Good Standing dated

February 5, 2008, issued by the Washington State Bar Association, annexed to the affidavit of

Ms. Culbert.

4. Ms. Culbert is familiar with the requirements of the Local Rules of this Court and

particularly, that upon admission, she becomes subject to the disciplinary jurisdiction of this

Court.

5. A proposed order is annexed hereto for the Court's convenience.

WHEREFORE, deponent respectfully requests that the motion for admission of Regina

V. Culbert pro hac vice be granted.

Keith E. Sharkin

Sworn to before me this <u>day</u> of February, 2008

Notary Public

JOHN C. McCULLOUGH Notary Public, State of New York No. **21-4905111** 

Qualified in New York County Commision Expires Oct. 19, 199

1-30-2010

Keith E. Sharkin

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(212) 556-2100
ksharkin@kslaw.com
Attorneys for Plaintiffs

## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VOSS OF NORWAY, A.S.A.;	)
VOSS PRODUCTIONS, AS;	)
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	) 07 Civ. 7649 (LLS)
Plaintiffs,	)
	)
V.	)
	)
REVTECH, INC. and DECO PATENTS, INC.,	)
	)
Defendants.	)

#### AFFIDAVIT OF REGINA V. CULBERT

STATE OF WASHINGTON	)
	)
COUNTY OF KING	)

Regina V. Culbert, being duly sworn, deposes and says:

- 1. I am of counsel with the firm Merchant & Gould P.C., 701 Fifth Avenue, Suite 4100, Seattle, Washington 98104, attorney for Plaintiffs VOSS of Norway, ASA, et al., in the above-captioned case (the "Plaintiffs"). I submit this affidavit in support of my application for admission to the Bar of this Court *pro hac vice* to argue and try, in whole or in part the above-captioned case on behalf of the Plaintiffs.
- 2. I am duly admitted to practice in the State of Washington. I am in good standing as a member of the State Bar of Washington, as is certified by the annexed Status Certificate from the Washington State Bar Association, dated February 5, 2008. I have never been disciplined or disbarred in any Court.

- I have previously applied for admission to this Court pro hac vice in a 3. prior case for the Plaintiffs, and that application was granted. See Voss v. Enoitalia, Civil Action No. 05-Civ-8061 RMB.
- I am fully familiar with the requirements of the Local Rules of this Court 4. and particularly, that upon admission, I become subject to the disciplinary jurisdiction of this Court.

WHEREFORE, I respectfully request that the motion for my admission pro hac vice be granted.

Dated:	Feb. 6,2008	Magia	Calbel
		D : 41 G 11	

Regina V. Culbert

STATE OF WASHINGTON )

**COUNTY OF KING** 

On this \_\_\_\_\_ day of February, 2008, before me personally appeared to me known and known to me to be the person described in and who executed the foregoing instrument, and he duly acknowledged to me that he executed the same for the uses and purposes therein set forth.

Stockwell

MY COMMISSION EXPIRES: FEBRUARY 28 2010



# STATUS CERTIFICATE

This certifies that

## REGINA VOGEL CULBERT

was admitted to the Bar of the State of Washington on July 10, 2000, has been an active member since admission, and has complied with all requirements of the Washington State Bar Association for payment of licensing fees and attendance at continuing legal education programs.

Dated as of February 5, 2008.

Paula C. Littlewood Executive Director

Kanla Chillerond

Washington State Bar Association 1325 Fourth Avenue, Suite 600 Seattle, WA 98101-2539 206-443-WSBA Keith E. Sharkin

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Attorneys for Plaintiffs

## IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VOSS OF NORWAY, A.S.A.;	)	
VOSS PRODUCTIONS, AS;	)	
VOSS USA, INC.;	)	
ENERGY GROUP, AS; and	)	
G ENERGY, INC.,	)	Civil Action No.
	)	07 Civ. 7649 (LLS)
Plaintiffs,	)	
	)	ORDER FOR ADMISSION
V.	)	PRO HAC VICE OF
	)	REGINA V. CULBERT
REVTECH, INC. and DECO PATENTS, INC.,	)	ON WRITTEN MOTION
	)	
Defendants.	)	

Upon the motion of Keith E. Sharkin, attorney for plaintiffs and said sponsor attorney's affidavit in support; IT IS HEREBY ORDER THAT

Applicant's Name: Regina V. Culbert
Firm Name: Merchant & Gould P.C.
Address: 701 Fifth Avenue

Suite 4100

City/State/Zip: Seattle, Washington 98104

Phone Number: (206) 342-6200 Fax Number: (206) 342-6201

Email Address: rculbert@merchantgould.com

is admitted to practice pro hac vice as counsel for plaintiffs in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of all attorneys. If this action is assigned to the Electronic Case Filing (ECF) system,

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counsel shall immediately apply for an ECF passwo	ord at nysd.uscourts.gov.	Counsel shall
forward the pro hac vice fee to the Clerk of the Court.		
Dated: February , 2008		
, <u> </u>	Honorable Louis L. St United States District.	

### **CERTIFICATE OF SERVICE**

I, Keith E. Sharkin, hereby certify that on this 7<sup>th</sup> day of February, 2008, a true copy of the foregoing Notice of Motion and the Accompanying Affidavits of Keith E. Sharkin and Regina V. Culbert were served upon the following counsel of record by First Class mail:

Alan A. Heller, Esq. Heller, Horowitz & Feit, P.C. 292 Madison Avenue New York, NY 10017

Dated: New York, New York February 7, 2008

Keith E. Sharkin